

APPENDIX B

APPENDIX B: Selected¹ Quotations from Dr. Shamos' Invalidity Report that cite to admitted trial exhibits and support his opinion that certain asserted claims are obvious in view of the combination of P.O. Writer and J-CON.

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
'683 Patent		
3. An electronic sourcing system comprising:	<p>From Shamos Report (Ex. F) at ¶181:</p> <p>"The P.O. Writer Plus system was an electronic sourcing system that included an electronic database that retained and retrieved product information from multiple vendors, including information such as an item number, item description, inventory location, price, commodity code, unit of measure, and vendor identification. The P.O. Writer Manual, Guided Tour at 22 & 130-31." L0126552, L0126661-62 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K95 at p. 21):</p> <p>"P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. . . Locating items is disclosed at L0127525-30 (Requisitioning manual)." (DX-141).</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>"The J-CON Manual describes an electronic-sourcing system, the J-CON ("Jobber- Connection") system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called "Jobbers" in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the '683 Patent Reexamination at 10 & 33; Non-Final rejection in the '172 Patent Reexamination at 22)." L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S95 at p. 21):</p> <p>"J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: 'PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.'</p> <p>Purchasing items is disclosed [sic], e.g., at L0123459 et seq. ('Start the</p>

¹ In the interest of brevity, Lawson has not exhaustively included every citation in support of these arguments that Dr. Shamos made to an admitted exhibit in his expert report, but rather has included representative citations to admitted exhibits.

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>Sale'). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information)." (DX-96).</p> <p>From Shamos Claim Chart (Ex. H) (Cell R95 at p. 21):</p> <p>"J-CON is an electronic sourcing system. (L0123423)." (DX-96).</p>
<p>at least two product catalogs containing data relating to items associated with the respective sources;</p>	<p>From Shamos Report (Ex. F) at ¶182:</p> <p>"The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .)." L0126576-77 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K97 at p. 22):</p> <p>"To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a 'separate portion,' this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): 'Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base.'" L0126575. (DX-117).</p> <p>"P.O. Writer accommodated catalogs of multiple vendors: 'You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.'" L0126552. (DX-117).</p>	

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>“The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: ‘Since you haven’t received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER].’” L0126552. (DX-117).</p> <p>“Catalogs were published by vendors: ‘Bayless Stationer publishes a catalogue of office supplies they sell.’” L0126575. (DX-117).</p> <p>From Shamos Claim Chart (Ex. H) (Cell J97 at p. 22):</p> <p>“P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).” (DX-141; DX-117)</p>	
means for selecting the product catalogs to search;	<p>From Shamos Report (Ex. F) at ¶182:</p> <p>“The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .).” L0126576-77 (DX-117)</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S99 at p. 22):</p> <p>“You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the</p>

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		<p>manufacturers whose InterChange catalogs you want to search.” L0123624.</p> <p>The purpose of InterChange was to allow selection from among competitive items from multiple sources.” L0123624 (DX-96).</p>
<p>means for searching for matching items among the selected product catalogs;</p>	<p>From Shamos Report (Ex. F) at ¶182:</p> <p>“The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .).” L0126576-77 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J102 at p. 23):</p> <p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).” (DX-141).</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123601, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R102 at p. 23):</p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96).</p>
<p>means for building a requisition using data relating to selected matching items and their associated source(s);</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>“After a desired item was selected from the results of a database search, the P.O. Writer Plus system was capable of transferring the relevant product information for the selected item from the database onto an electronic requisition. (The P.O. Writer Manual, Guided Tour at 47-49 & 117-47. . .).” L0126577-79, L0126648-78 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K105 at p. 23):</p> <p>“A requisition module performs the</p>	<p>From Shamos Report (Ex. F) at ¶197:</p> <p>“Upon selection of desired parts from database search results, the J-CON system could transfer the relevant automotive parts information for the selected parts from the database onto an electronic requisition (called a “ticket” in the J-CON literature). (The J-CON Manual at Ch. 3, Sec. 2, Pages 1, 4 & 8-9; Final Rejection in the ’683 Patent Reexamination at 11-12 & 34; Non-Final rejection in the ’172 Patent Reexamination at 23).”</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described . . . at L0127531-36.” L0127530-36 (DX-141).</p> <p>From Shamos Claim Chart (Ex. H) (Cell J105 at p. 23):</p> <p>“P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).” (DX-117).</p>	<p>L0123603, L0123607, L0123611-12 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R105 at p. 23):</p> <p>“J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).” (DX-96).</p>
<p>means for processing the requisition to generate one or more purchase orders for the selected matching items; and</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>“For a selected item in the requisition, the P.O. Writer Plus system was capable of: (1) determining the availability of the item in the inventory of the customer; (2) utilizing EDI transactions or issuing RFQs to multiple vendors to ascertain, record, and retrieve the availability of the selected item from a prospective vendor; (3) determining the price of an item; (4) cross-referencing or converting data relating to the selected item to a generally equivalent item from a different source; and (5) generating multiple purchase orders from a single requisition. (The P.O. Writer Manual, Guided Tour at 49 & 149-53).” L0126680-84 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K107 at p. 24):</p> <p>“The reference discloses a purchase order generation module operating on a computer system having access to the requisition.</p> <p>The user causes a purchase order to be generated from a requisition at least when the user enter ‘P’ or ‘U’ as described at L0127535 to transmit the</p>	<p>From Shamos Report (Ex. F) at ¶200:</p> <p>“Finally, the J-CON system could generate multiple purchase orders from a single requisition. (The J-CON Manual at Ch. 4, Sec. 3, Page 1 & Ch. 4, Sec. 4, Pages 1-7; Final Rejection in the ‘683 Patent Reexamination at 12; Non-Final rejection in the ‘172 Patent Reexamination at 23-24).” L0123691; L0123693-699 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S107 at p. 24):</p> <p>“The reference discloses a means for processing a requisition to generate purchase orders for requisition items.</p> <p>‘You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS.’ L0123693</p> <p>The module has access to the requisition (ticket): ‘When you compute PO for primary or alternate vendor J-CON checks</p>

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	<p>requisition to Purchasing.” (DX-141).</p> <p>“Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. ‘Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically.’” L0126966 (DX-133).</p>	<p>each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered.’ L0123695” (DX-96) (</p> <p>From Shamos Claim Chart (Ex. H) (Cell R107 at p. 24):</p> <p>“J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).” (DX-96).</p>
<p>means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>“For a selected item in the requisition, the P.O. Writer Plus system was capable of: (1) determining the availability of the item in the inventory of the customer; (2) utilizing EDI transactions or issuing RFQs to multiple vendors to ascertain, record, and retrieve the availability of the selected item from a prospective vendor; (3) determining the price of an item; (4) cross-referencing or converting data relating to the selected item to a generally equivalent item from a different source; and (5) generating multiple purchase orders from a single requisition. (The P.O. Writer Manual, Guided Tour at 49 & 149-53).” L0126680-84 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K109 at p. 24):</p> <p>“To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and Lawson's prior art system also disclose the element.</p> <p>This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g, Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed</p>	<p>From Shamos Report (Ex. F) at ¶199:</p> <p>“The J-CON system could perform a cross-referencing or converting of data relating to an item on the requisition to determine an alternative source for the same item and/or an acceptable substitute for the item initially selected. (The J-CON Manual at Ch. 3, Sec. 2, Pages 6 & 11 & Ch. 3, Sec. 4, Pages 1-5; Final Rejection in the ‘683 Patent Reexamination at 13-14 & 35-36; Non-Final rejection in the ‘172 Patent Reexamination at 25-26).” L0123608, L0123611, L0123621-625 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S109 at p. 24):</p> <p>“The reference discloses a means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.</p> <p>To the extent that ePlus contends that UNSPSC codes in Lawson's accused system designate ‘generally equivalent’ items, this limitation is also disclosed in J-CON and in Lawson's prior art system.</p> <p>The reference discloses maintaining a cross-reference table</p>

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	<p>‘determination system.’ An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent.</p> <p>Cross-referenced items and identical items are shown in the table at L0126552.” (DX-117).</p> <p>From Shamos Claim Chart (Ex. H) (Cell J109 at p. 24):</p> <p>“During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).” (DX-133).</p>	<p>(non-catalog database) or file identifying cross-referenced items: ‘InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder.’ L0123621.” (DX-96).</p> <p>From Shamos Claim Chart (Ex. H) (Cell S110 at p. 25):</p> <p>“‘If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts).’ L0123601.</p> <p>‘[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references.’ L013628.” (DX-96).</p> <p>From Shamos Claim Chart (Ex. H) (Cell R109 at p. 24):</p> <p>“The J-CON system located interchangeable part from different catalogs are associated with a ‘competitive part number’ in the cross-referencing module InterChange. (L0123625).” (DX-96).</p>
<p>26. A method comprising the steps of:</p>		
<p>maintaining at least two product catalogs on a database containing data relating to items associated with the respective sources;</p>	<p>From Shamos Report (Ex. F) at ¶181:</p> <p>“The P.O. Writer Plus system was an electronic sourcing system that included an electronic database that retained and retrieved product information from multiple vendors, including information such as an item number, item description, inventory location, price, commodity code, unit</p>	

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	<p>of measure, and vendor identification. The P.O. Writer Manual, Guided Tour at 22 & 130-31.” L0126552, L0126661-62 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K133 p. 29):</p> <p>“To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a ""separate portion,"" this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): ‘Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base.’ L0126575.” (DX-117).</p> <p>“P.O. Writer accommodated catalogs of multiple vendors: ‘You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.” (DX-117).</p> <p>“The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: ‘Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER].’ L0126552.” (DX-117).</p> <p>“Catalogs were published by vendors: ‘Bayless Stationer publishes a catalogue of office supplies they sell.’ L0126575.” (DX-117).</p> <p>From Shamos Claim Chart (Ex. H) (Cell J133 at p. 29):</p> <p>“P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).” (DX-117).</p>	
selecting the product catalogs	From Shamos Report (Ex. F) at	From Shamos Report (Ex. F) at

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to search;	<p>¶182:</p> <p>“The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .).” L0126576-77 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K135 at p. 29):</p> <p>“P.O. Writer accommodated catalogs of multiple vendors: ‘You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.” (DX-117).</p>	<p>¶196:</p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123601, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S135 at p. 29):</p> <p>“Searches may be limited to a particular manufacturer. ‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.” (DX-96)</p>
searching for matching items among the selected product catalogs;	<p>From Shamos Report (Ex. F) at ¶182:</p> <p>“The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .).” L0126576-77 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K138 at p. 30):</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123601, L0123613, L0123805 (DX-96)</p>

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	<p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525.” (DX-141).</p> <p>From Shamos Claim Chart (Ex. H) (Cell J137 at p. 30):</p> <p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).” (DX-141)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S137 at p. 30):</p> <p>““The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name.’ L0123609.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R137 at p. 30):</p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96)</p>
<p>building a requisition using data relating to selected matching items and their associated sources;</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>“After a desired item was selected from the results of a database search, the P.O. Writer Plus system was capable of transferring the relevant product information for the selected item from the database onto an electronic requisition. (The P.O. Writer Manual, Guided Tour at 47-49 & 117-47. . .).” L0126577-79, L0126648-78 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K140 at p. 30):</p> <p>“A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to</p>	<p>From Shamos Report (Ex. F) at ¶197:</p> <p>“Upon selection of desired parts from database search results, the J-CON system could transfer the relevant automotive parts information for the selected parts from the database onto an electronic requisition (called a “ticket” in the J-CON literature). (The J-CON Manual at Ch. 3, Sec. 2, Pages 1, 4 & 8-9; Final Rejection in the ‘683 Patent Reexamination at 11-12 & 34; Non-Final rejection in the ‘172 Patent Reexamination at 23).” L0123603, L0123607, L0123611-12 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R140 at p. 30):</p>

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	<p>be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described . . . at L0127531-36.” L0127530-36 (DX-141).</p> <p>From Shamos Claim Chart (Ex. H) (Cell J140 at p. 30):</p> <p>“P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).” (DX-117)</p>	<p>“J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).” (DX-96)</p>
<p>processing the requisition to generate one or more purchase orders for the selected matching items; and</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>“For a selected item in the requisition, the P.O. Writer Plus system was capable of: (1) determining the availability of the item in the inventory of the customer; (2) utilizing EDI transactions or issuing RFQs to multiple vendors to ascertain, record, and retrieve the availability of the selected item from a prospective vendor; (3) determining the price of an item; (4) cross-referencing or converting data relating to the selected item to a generally equivalent item from a different source; and (5) generating multiple purchase orders from a single requisition. (The P.O. Writer Manual, Guided Tour at 49 & 149-53).” L0126680-84 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K142 at p. 31):</p> <p>“The reference discloses a purchase order generation module operating on a computer system having access to the requisition.</p> <p>The user causes a purchase order to be generated from a requisition at least when the user enter ‘P’ or ‘U’ as described at L0127535 to transmit the requisition to Purchasing.” (DX-141)</p> <p>“P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating</p>	<p>From Shamos Report (Ex. F) at ¶200:</p> <p>“Finally, the J-CON system could generate multiple purchase orders from a single requisition. (The J-CON Manual at Ch. 4, Sec. 3, Page 1 & Ch. 4, Sec. 4, Pages 1-7; Final Rejection in the ’683 Patent Reexamination at 12; Non-Final rejection in the ’172 Patent Reexamination at 23-24).” L0123691; L0123693-699 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S142 at p. 31):</p> <p>“J-CON generated multiple purchase orders from a single requisition . ‘The purchasing programs enable you to quickly create purchase orders based on your real needs.’ L0123423.” (DX-96)</p> <p>““You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up P0 control files in Function 7.7.’ L0123693.” (DX-96)</p> <p>“Generation of multiple purchase orders is disclosed beginning at</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966." (DX-133)</p>	<p>L0123695, e.g.: 'When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered.'" (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R142 at p. 31):</p> <p>"J-CON could be configured to process purchase orders manually or automatically. (L0123693-99)." (DX-96)</p>
<p>determining whether a selected matching item is available in inventory.</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>"For a selected item in the requisition, the P.O. Writer Plus system was capable of: (1) determining the availability of the item in the inventory of the customer; (2) utilizing EDI transactions or issuing RFQs to multiple vendors to ascertain, record, and retrieve the availability of the selected item from a prospective vendor; (3) determining the price of an item; (4) cross-referencing or converting data relating to the selected item to a generally equivalent item from a different source; and (5) generating multiple purchase orders from a single requisition. (The P.O. Writer Manual, Guided Tour at 49 & 149-53)." L0126680-84 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K144 at p. 31):</p> <p>"The Inventory Control Module allows you to track on-hand Inventory balances capture and report usage history and automatically generate Re-order Analysis as often as you like." L0126633." (DX-117)</p> <p>"The Inventory Control module is the subject of an entire manual at L0126148-395." (DX-126)</p>	<p>From Shamos Report (Ex. F) at ¶197:</p> <p>"For a selected item on the requisition, the J-CON system could electronically determine the current availability in the inventory of the automotive parts store, any sister stores associated with the automotive parts store, and/or independent distributors to the automotive parts store. (The J-CON Manual at Ch. 2, Sec. 10, Page 15 & Ch. 3, Sec. 2, Pages 6 & 10; Final Rejection in the '683 Patent Reexamination at 13 & 34; Non-Final rejection in the '172 Patent Reexamination at 25-26)." L0123555, L0123609, L0123613 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S144at p. 31):</p> <p>"JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT." L0123450." (DX-96)</p> <p>"Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>pressing <Whse Inquiry> from any field on the POS screen except WRKSTAT.’ L0123451.</p> <p>Inventory inquiry is described in detail starting at L0123541.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R144 at p. 31):</p> <p>“The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 & L0123612).” (DX-96)</p>
<p>28. A method comprising the steps of:</p>		
<p>maintaining at least two product catalogs on a database containing data relating to items associated with the respective sources;</p>	<p>From Shamos Report (Ex. F) at ¶181:</p> <p>“The P.O. Writer Plus system was an electronic sourcing system that included an electronic database that retained and retrieved product information from multiple vendors, including information such as an item number, item description, inventory location, price, commodity code, unit of measure, and vendor identification. The P.O. Writer Manual, Guided Tour at 22 & 130-31.” L0126552, L0126661-62 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K147 at p. 32):</p> <p>“To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a ""separate portion,"" this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): ‘Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base.’ L0126575.” (DX-117)</p>	

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>“P.O. Writer accommodated catalogs of multiple vendors: ‘You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.” (DX-117)</p> <p>“The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: ‘Since you haven’t received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER].’ L0126552.” (DX-117)</p> <p>“Catalogs were published by vendors: ‘Bayless Stationer publishes a catalogue of office supplies they sell.’ L0126575.” (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J147 at p. 32):</p> <p>“P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).” (DX-117)</p>	
selecting the product catalogs to search;	<p>From Shamos Report (Ex. F) at ¶182:</p> <p>“The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .).” L0126576-77 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K149 at p. 32):</p> <p>“P.O. Writer accommodated catalogs of multiple vendors: ‘You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.” (DX-117)</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S149 at p. 32):</p> <p>“Searches may be limited to a particular manufacturer. ‘You might want to search for InterChange parts by manufacturer</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.” (DX-96)
searching for matching items among the selected product catalogs;	<p data-bbox="565 625 927 684">From Shamos Report (Ex. F) at ¶182:</p> <p data-bbox="565 716 987 1079">“The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .).” L0126576-77 (DX-117)</p> <p data-bbox="565 1110 964 1169">From Shamos Claim Chart (Ex. H) (Cell J151 at p. 33):</p> <p data-bbox="565 1201 976 1444">“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).” (DX-141)</p>	<p data-bbox="1019 625 1382 684">From Shamos Report (Ex. F) at ¶196:</p> <p data-bbox="1019 716 1398 1140">“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p data-bbox="1019 1171 1382 1230">From Shamos Claim Chart (Ex. H) (Cell S151 at p. 33):</p> <p data-bbox="1019 1262 1398 1839">““The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name.’ L0123609.” (DX-96)</p> <p data-bbox="1019 1871 1382 1902">From Shamos Claim Chart (Ex.</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>H) (Cell R151 at p. 33):</p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96)</p>
<p>building a requisition using data relating to selected matching items and their associated source(s);</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>“After a desired item was selected from the results of a database search, the P.O. Writer Plus system was capable of transferring the relevant product information for the selected item from the database onto an electronic requisition. (The P.O. Writer Manual, Guided Tour at 47-49 & 117-47. . .).” L0126577-79, L0126648-78 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K154 at p. 33):</p> <p>“The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.</p> <p>A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.” (DX-141)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J154 at p. 33):</p> <p>“P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).” (DX-117)</p>	<p>From Shamos Report (Ex. F) at ¶197:</p> <p>“Upon selection of desired parts from database search results, the J-CON system could transfer the relevant automotive parts information for the selected parts from the database onto an electronic requisition (called a “ticket” in the J-CON literature). (The J-CON Manual at Ch. 3, Sec. 2, Pages 1, 4 & 8-9; Final Rejection in the ’683 Patent Reexamination at 11-12 & 34; Non-Final rejection in the ’172 Patent Reexamination at 23).” L0123603, L0123607, L0123611-12 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R154 at p. 33):</p> <p>“J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).” (DX-96)</p>
<p>processing the requisition to generate one or more purchase</p>	<p>From Shamos Report (Ex. F) at ¶183:</p>	<p>From Shamos Report (Ex. F) at ¶200:</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
orders for the selected matching items; and	<p>“For a selected item in the requisition, the P.O. Writer Plus system was capable of: (1) determining the availability of the item in the inventory of the customer; (2) utilizing EDI transactions or issuing RFQs to multiple vendors to ascertain, record, and retrieve the availability of the selected item from a prospective vendor; (3) determining the price of an item; (4) cross-referencing or converting data relating to the selected item to a generally equivalent item from a different source; and (5) generating multiple purchase orders from a single requisition. (The P.O. Writer Manual, Guided Tour at 49 & 149-53).” L0126680-84 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K156 at p. 34):</p> <p>“The reference discloses a purchase order generation module operating on a computer system having access to the requisition.</p> <p>The user causes a purchase order to be generated from a requisition at least when the user enter ‘P’ or ‘U’ as described at L0127535 to transmit the requisition to Purchasing.” (DX-141)</p> <p>“Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. ‘Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically.’ L0126966.” (DX-133)</p>	<p>“Finally, the J-CON system could generate multiple purchase orders from a single requisition. (The J-CON Manual at Ch. 4, Sec. 3, Page 1 & Ch. 4, Sec. 4, Pages 1-7; Final Rejection in the ’683 Patent Reexamination at 12; Non-Final rejection in the ’172 Patent Reexamination at 23-24).” L0123691; L0123693-699 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S156 at p. 34):</p> <p>“J-CON generated multiple purchase orders from a single requisition . ‘The purchasing programs enable you to quickly create purchase orders based on your real needs.’ L0123423.” (DX-96)</p> <p>““You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up P0 control files in Function 7.7.’ L0123693.” (DX-96)</p> <p>“Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: ‘When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered.’” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R156 at p. 34):</p> <p>“J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).” (DX-96)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
<p>converting data relating to a selected matching item and an associated source to data relating to an item and a different source.</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>“For a selected item in the requisition, the P.O. Writer Plus system was capable of: (1) determining the availability of the item in the inventory of the customer; (2) utilizing EDI transactions or issuing RFQs to multiple vendors to ascertain, record, and retrieve the availability of the selected item from a prospective vendor; (3) determining the price of an item; (4) cross-referencing or converting data relating to the selected item to a generally equivalent item from a different source; and (5) generating multiple purchase orders from a single requisition. (The P.O. Writer Manual, Guided Tour at 49 & 149-53).” L0126680-84 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K158 at p. 34):</p> <p>“To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and Lawson's prior art system also disclose the element.</p> <p>This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed ‘determination system.’ An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent.</p> <p>Cross-referenced items and identical items are shown in the table at L0126552“ (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J158 at p. 34):</p> <p>“During Purchase Order generation on the P.O. Writer system, the vendor</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S159 at p. 34):</p> <p>“J-CON had a sophisticated system for keeping track of equivalent items, dividing them into ‘Replaced Parts,’ ‘Substitute Parts,’ and ‘Can-Use Parts.’ L0123551. Furthermore, ‘Alternate Parts’ and ‘Primary and Alternate Manufacturers’ are disclosed at L0123613.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R158 at p. 34):</p> <p>“The J-CON system located interchangeable part from different catalogs are associated with a ‘competitive part number’ in the cross-referencing module InterChange. (L0123625).” (DX-96)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	listed on the requisition could be automatically converted to different vendors. (L012976-80).” (DX-133)	
<p>29. The method of claim 28 further comprising the step of determining whether a selected matching item is available in inventory.</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>“For a selected item in the requisition, the P.O. Writer Plus system was capable of: (1) determining the availability of the item in the inventory of the customer; (2) utilizing EDI transactions or issuing RFQs to multiple vendors to ascertain, record, and retrieve the availability of the selected item from a prospective vendor; (3) determining the price of an item; (4) cross-referencing or converting data relating to the selected item to a generally equivalent item from a different source; and (5) generating multiple purchase orders from a single requisition. (The P.O. Writer Manual, Guided Tour at 49 & 149-53).” L0126680-84 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K165 at p. 35):</p> <p>“The Inventory Control Module allows you to track on-hand Inventory balances capture and report usage history and automatically generate Re-order Analysis as often as you like.” L0126633.” (DX-117)</p> <p>“The Inventory Control module is the subject of an entire manual at L0126148-395.” (DX-126)</p>	<p>From Shamos Report (Ex. F) at ¶197:</p> <p>“For a selected item on the requisition, the J-CON system could electronically determine the current availability in the inventory of the automotive parts store, any sister stores associated with the automotive parts store, and/or independent distributors to the automotive parts store. (The J-CON Manual at Ch. 2, Sec. 10, Page 15 & Ch. 3, Sec. 2, Pages 6 & 10; Final Rejection in the ’683 Patent Reexamination at 13 & 34; Non-Final rejection in the ’172 Patent Reexamination at 25-26).” L0123555, L0123609, L0123613 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S165 at p. 35):</p> <p>“JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT.” L0123450.” (DX-96)</p> <p>“Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing <Whse Inquiry> from any field on the POS screen except WRKSTAT.” L0123451. Inventory inquiry is described in detail starting at L0123541.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R165 at p. 35):</p> <p>“The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 &</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		L0123612).” (DX-96)
‘516 Patent		
1. An electronic sourcing system comprising:	<p>From Shamos Report (Ex. F) at ¶181:</p> <p>“The P.O. Writer Plus system was an electronic sourcing system that included an electronic database that retained and retrieved product information from multiple vendors, including information such as an item number, item description, inventory location, price, commodity code, unit of measure, and vendor identification. The P.O. Writer Manual, Guided Tour at 22 & 130-31.” L0126552, L0126661-62 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K34 at p. 6):</p> <p>“P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.</p> <p>Locating items is disclosed at L0127525-30 (Requisitioning manual).” (DX-141)</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON Manual describes an electronic-sourcing system, the J-CON (“Jobber- Connection”) system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called “Jobbers” in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S34 at p. 6):</p> <p>“J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: ‘PartFinder is J-CON’s electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.’” (DX-96)</p> <p>“Purchasing items is disclosed [sic], e.g., at L0123459 et seq. (‘Start the Sale’). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).” (DX-96)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>From Shamos Claim Chart (Ex. H) (Cell R34 at p. 6):</p> <p>“J-CON is an electronic sourcing system. (L0123423).” (DX-96)</p>
<p>a collection of catalogs of items stored in an electronic format;</p>	<p>From Shamos Report (Ex. F) at ¶182:</p> <p>“The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .).” L0126576-77 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K37 at p. 7):</p> <p>“To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a ‘separate portion,’ this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): ‘Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base.’ L0126575.” (DX-117)</p> <p>“P.O. Writer accommodated catalogs of multiple vendors: ‘You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.” (DX-117)</p> <p>“The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: ‘Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type</p>	

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>12345 [ENTER].’ L0126552.” (DX-117)</p> <p>“Catalogs were published by vendors: ‘Bayless Stationer publishes a catalogue of office supplies they sell.’ L0126575.” (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J37 at p. 7):</p> <p>“P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).” (DX-117)</p>	
<p>a first set of predetermined criteria associated with said collection of catalogs;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K39 at p. 7):</p> <p>“If ‘first set of pre-determined criteria’ means restriction to specific catalogs, then searches may be limited by CATALOGUE IDs. L0127525.” (DX-141)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S39 at p. 7):</p> <p>“If ‘first set of pre-determined criteria’ means restriction to specific catalogs, then searches may be limited by manufacturer. ‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.” (DX-96)</p>
<p>a second set of predetermined criteria associated with items from each of said catalogs;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K41 at p. 8):</p> <p>“If ‘second set of pre-determined criteria’ means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525 & L0127528.” (DX-141)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S41 at p. 8):</p> <p>“If ‘second set of pre-determined criteria’ means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. ‘The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press Index at the GROUP</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be.' L0123609." (DX-96)</p> <p>"J-CON also provided for wildcard searching: 'When you use wild card and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices.' L0123473." (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R41 at p. 8):</p> <p>"J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613)." (DX-96)</p>
<p>a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party that is one of a manufacturer and a competing vendor, said predetermined third party selling items corresponding to items in said vendor catalog; and</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K42 at p. 8):</p> <p>"P.O. Writer accommodated catalogs of multiple vendors: 'You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.' L0126552." (DX-117)</p> <p>"The database could be searched by vendor number, indicating a portion to be searched separately: 'Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER].' L0126552." (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K43 at p. 8):</p> <p>"Searching for 'corresponding items' is disclosed because P.O. Writer enabled the user to order a given item from any of several different vendors. L0126552." (DX-117)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S42 at p. 8):</p> <p>"'You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.' L0123624." (DX-96)</p>
<p>a search program, said search program relying on said second set of criteria to select specific items from said</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K45 at p. 9):</p> <p>"The search engine confines its search</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S45 at p. 9):</p> <p>"J-CON included a search program</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
catalogs determined from said catalog selection protocol.	<p>to the catalogs identified by the first set of criteria, and therefore relies on those criteria. L0127525 & L0127528.” (DX-141)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J45 at p. 9):</p> <p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525).” (DX-141)</p>	<p>for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.” (DX-96)</p> <p>““Once you’ve entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer.’ L0123623.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R45 at p. 9):</p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96)</p>
6. An electronic sourcing system as recited in claim 1, wherein said second set of predetermined criteria includes at least one of a catalog number and item textual information.	<p>From Shamos Claim Chart (Ex. H) (Cell K48 at p. 9):</p> <p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525.” (DX-141)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J48 at p. 9):</p> <p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525).” (DX-141)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S48 at p. 9):</p> <p>“J -CON enabled a user to search by part number (catalog number). L0123625.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R48 at p. 9):</p> <p>“J -CON enabled a user to enter part numbers as a basis for searching the database for desired items. (L0123625).” (DX-96)</p>
9. An electronic sourcing system comprising:	<p>From Shamos Report (Ex. F) at ¶181:</p> <p>“The P.O. Writer Plus system was an electronic sourcing system that</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON Manual describes an electronic-sourcing system, the J-</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>included an electronic database that retained and retrieved product information from multiple vendors, including information such as an item number, item description, inventory location, price, commodity code, unit of measure, and vendor identification. The P.O. Writer Manual, Guided Tour at 22 & 130-31.” L0126552, L0126661-62 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K49 at p. 10):</p> <p>“P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.</p> <p>Locating items is disclosed at L0127525-30 (Requisitioning manual).” (DX-141)</p>	<p>CON (“Jobber- Connection”) system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called “Jobbers” in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S49 at p. 10):</p> <p>“J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: ‘PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.’” (DX-96)</p> <p>“Purchasing items is disclosed [sic], e.g., at L0123459 et seq. (‘Start the Sale’). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R49 at p. 10):</p> <p>“J-CON is an electronic sourcing system. (L0123423).” (DX-96)</p>
a collection of catalogs of items stored in an electronic format;	From Shamos Claim Chart (Ex. H) (Cell K51 at p. 11):	

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>“To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a ‘separate portion,’ this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): ‘Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base.’ L0126575.” (DX-117)</p> <p>“P.O. Writer accommodated catalogs of multiple vendors: ‘You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.” (DX-117)</p> <p>“The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: ‘Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER].’ L0126552.” (DX-117)</p> <p>“Catalogs were published by vendors: ‘Bayless Stationer publishes a catalogue of office supplies they sell.’ L0126575” (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J51 at p. 11):</p> <p>“P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).” (DX-140; DX-117)</p>	
<p>a first identification code associated with a first item in a first catalog;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K53 at p. 11):</p> <p>“P.O. Writer enabled a user to search for matching items among product catalogs by entering search criteria, including item number, item description, and commodity code, that</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S53 at p. 11):</p> <p>“Items in J-CON can be identified by codes, such as manufacturer's code (L0123450) or part number (L0123456).” (DX-96)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	at least partially describes a desired item. (L0127525 & L0127528).” (DX-141)	
<p>a second identification code associated with a second item in a second catalog, said first item and said second item being generally equivalent, and wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the other of said catalogs.</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K56 at p. 12):</p> <p>“This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g, Best Buy and Bayless.” (DX-117)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S56 at p. 12):</p> <p>““InterChange is J-CONs electronic cross-reference for parts. You begin InterChange by pressing InterChange from any field on the POS screen except WRKSTAT or from PartFinder.’ L0123450.” (DX-96)</p> <p>““If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts). InterChange can find an InterChange part even if you do not know the manufacturer or the complete part number of the competitive part.’ L0123601.” (DX-96)</p> <p>““InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder.’ L0123621.” (DX-96)</p> <p>““InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references.’ L0123628.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S57 at p. 12):</p> <p>“J-CON had a sophisticated system for keeping track of equivalent items, dividing them into ‘Replaced Parts,’ ‘Substitute Parts,’ and ‘Can-Use Parts.’ L0123551. Furthermore, ‘Alternate Parts’ and ‘Primary and Alternate Manufacturers’ are disclosed at L0123613.” (DX-96)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
<p>21. An electronic sourcing system comprising:</p>	<p>From Shamos Report (Ex. F) at ¶181:</p> <p>“The P.O. Writer Plus system was an electronic sourcing system that included an electronic database that retained and retrieved product information from multiple vendors, including information such as an item number, item description, inventory location, price, commodity code, unit of measure, and vendor identification. The P.O. Writer Manual, Guided Tour at 22 & 130-31.” L0126552, L0126661-62 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K60 at p. 13):</p> <p>“P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.</p> <p>Locating items is disclosed at L0127525-30 (Requisitioning manual).” (DX-141)</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON Manual describes an electronic-sourcing system, the J-CON (“Jobber- Connection”) system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called “Jobbers” in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S60 at p. 13):</p> <p>“J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: ‘PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.’” (DX-96)</p> <p>“Purchasing items is disclosed [sic], e.g., at L0123459 et seq. (‘Start the Sale’). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R60 at p. 13):</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>“J-CON is an electronic sourcing system. (L0123423).” (DX-96)</p>
<p>a requisition module including data fields, user generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K62 at p. 13):</p> <p>“P.O. Writer's requisition module is the subject of an entire manual, L0127505-601. To the extent the claim requires a ‘requisition module’ to generate criteria for searching, such a function is performed by the P.O. Writer search module using partial criteria as described in connection with '172 1c.</p> <p>To the extent ePlus accuses Lawson's system of possessing this element, the reference also discloses the element.” (DX-141)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S62 at p. 13):</p> <p>“In PartSource, items can be partially described via wildcards in data fields: ‘With PartSource you can use wild' cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters.’ L0123472.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R62 at p. 13):</p> <p>“J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).” (DX-96)</p>
<p>a catalog collection searching module, said searching module including a collection of catalogs of items stored in an electronic format, a catalog selection criteria used to select less than said entire collection, said searching module being used to generate additional search-module criteria for said data fields of said requisition module;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K63 at p. 14):</p> <p>“To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a ‘separate portion,’ this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): ‘Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base.’ L0126575.” (DX-117)</p> <p>“P.O. Writer accommodated catalogs of multiple vendors: ‘You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.” (DX-117)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S66 at p. 14):</p> <p>“To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.</p> <p>Searches may be limited to a particular manufacturer. ‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>“The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: ‘Since you haven’t received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER].’ L0126552.” (DX-117)</p> <p>“Catalogs were published by vendors: ‘Bayless Stationer publishes a catalogue of office supplies they sell.’ L0126575” (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K69 at p. 15):</p> <p>“To the extent meaning can be ascribed to this limitation, the search screen at L0127527 generates additional search-module criteria for data fields, e.g. ‘BEGINS WITH.’” (DX-141)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J63 at p. 14):</p> <p>“P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).” (DX-141; DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J69 at p. 15):</p> <p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).” (DX-141)</p>	<p>catalogs you want to search.’ L0123624.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S69 at p. 15):</p> <p>“To the extent meaning can be ascribed to this limitation, the search described at L0123609 discloses generation of additional search criteria: ‘The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name.’” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R66 at p. 14):</p> <p>“The J-CON system enabled a user to enter part numbers as a basis for searching the database for desired items and the results would display additional information. (L0123625).” (DX-96)</p>
<p>a multiple purchase order generation module, said purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search module criteria;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K70 at p. 15):</p> <p>“The P.O. WRITER PLUS Requisitioning Interface allows the Purchasing Department to convert requisitions into Purchase Orders quickly and efficiently.” L0126966. Requisitions can be split into separate</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S70 at p. 15):</p> <p>“J-CON generated multiple purchase orders from a single requisition . ‘The purchasing programs enable you to quickly create purchase orders based on your real needs.’</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>purchase orders: 'Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically.' L0126966" (DX-133)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J70 at p. 15):</p> <p>"P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976)." (DX-133)</p>	<p>L0123423." (DX-96)</p> <p>""You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up P0 control files in Function 7.7.' L0123693." (DX-96)</p> <p>"Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: 'When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered.'" (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R70 at p. 15):</p> <p>"J-CON generated multiple purchase orders from a single requisition in a number of different ways. (L013617)." (DX-96)</p>
<p>wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K71 at p. 16):</p> <p>"This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless." (DX-117)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S71 at p. 16):</p> <p>"InterChange provides the capability to find multiple sources for generally equivalent items: 'J-CON uses the manufacturer conversion tables during purchasing receiving automatic part maintenance and store-to-store inquiries. The tables can convert manufacturer codes subline numbers and price codes.' L0124150." (DX-96)</p> <p>""InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder.' LOL 23621. 'To find</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		an InterChange for a part the first step is to enter the part number in the COMPETITIVE PART field. The competitive part is the part for which you want to find an equivalent part.' L0123622." (DX-96)
<p>wherein said multiple sources is limited by said catalog searching module providing a match according to said usergenerated criteria, said search-module criteria and a determination system that located items are generally equivalent; and</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K74 at p. 16):</p> <p>"This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed 'determination system.' L0126552" (DX-117)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S74 at p. 16):</p> <p>"Determination: 'InterChange has a self-reference feature which is helpful to the novice counterperson who might look for an InterChange part for a line you carry. If an InterChange part is not found for the competitive part entered, InterChange checks to see you carry the competitive part.' L0123628." (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R74 at p. 16):</p> <p>"The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601)." (DX-96)</p>
<p>wherein said determination system includes a cross reference table matching an identification code from a first located item with a second identification code from a second located item.</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K76 at p. 16):</p> <p>"This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed 'determination system.' An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent." (DX-117)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S77 at p. 17):</p> <p>"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts).' L0123601. '[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references.' L013628" (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R76 at p. 16):</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>“The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601).” (DX-96)</p>
<p>22. An electronic sourcing system as recited in claim 21, wherein said determination system includes an identical identification code for each of said located items.</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K78 at p. 17):</p> <p>“This element appears to have no meaning. To the extent it has meaning sufficient to accuse Lawson's present system, it is also disclosed in the reference and in Lawson's prior art system.</p> <p>This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g, Best Buy and Bayless.</p> <p>All the items have the identical indentification [sic] code A1000.</p> <p>To the extent Plaintiff alleges this claim to be infringed by Lawson's current system, claim 22 is anticipated by P.O. Writer.” (DX-117)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S78 at p. 17):</p> <p>“This limitation has no ascertainable meaning. Nevertheless, parts that are equivalent in the J-CON system are identical unless they are identified as an alternate or replacement part: ‘When you enter replaced part and the quantity available is larger than the quantity ordered, J-CON displays the replacement part in the miscellaneous information section of the POS screen.’ L0123485.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R78 at p. 17):</p> <p>“The J-CON system located interchangeable part from different catalogs are associated with a ‘competitive part number’ in the cross-referencing module InterChange. (L0123625). The JCON system renders claim 22 obvious when combined with the Fisher RIMS system or the TV/2 system.” (DX-96)</p>
<p>29. An electronic sourcing system comprising:</p>	<p>From Shamos Report (Ex. F) at ¶181:</p> <p>“The P.O. Writer Plus system was an electronic sourcing system that included an electronic database that retained and retrieved product information from multiple vendors, including information such as an item number, item description, inventory location, price, commodity code, unit of measure, and vendor identification. The P.O. Writer Manual, Guided Tour</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON Manual describes an electronic-sourcing system, the J-CON (“Jobber- Connection”) system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called “Jobbers” in the J-CON literature). The J-CON system maintained a library of automotive</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>at 22 & 130-31.” L0126552, L0126661-62 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K79 at p. 17):</p> <p>“P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.</p> <p>Locating items is disclosed at L0127525-30 (Requisitioning manual).” (DX-141)</p>	<p>parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S79 at p. 17):</p> <p>“J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: ‘PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.’” (DX-96)</p> <p>“Purchasing items is disclosed [sic], e.g., at L0123459 et seq. (‘Start the Sale’). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R79 at p. 17):</p> <p>“J-CON is an electronic sourcing system. (L0123423).”</p>
<p>a collection of catalogs of items stored in an electronic format;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K81 at p. 18):</p> <p>“P.O. Writer maintained catalog data in an electronic database (electronic format): ‘Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base.’ L0126575.” (DX-117)</p>	

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>“P.O. Writer accommodated catalogs of multiple vendors: ‘You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.” (DX-117)</p> <p>“The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: ‘Since you haven’t received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER].’ L0126552.” (DX-117)</p> <p>“Catalogs were published by vendors: ‘Bayless Stationer publishes a catalogue of office supplies they sell.’ L0126575” (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J81 at p. 18):</p> <p>“P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).” (DX-141; DX-117)</p>	
<p>a first set of predetermined criteria associated with said collection of catalogs;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K83 at p. 18):</p> <p>“If ‘first set of pre-determined criteria’ means restriction to specific catalogs, then searches may be limited by CATALOGUE IDs. L0127525.” (DX-141)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S83 at p. 18):</p> <p>“If ‘first set of pre-determined criteria’ means restriction to specific catalogs, then searches may be limited by manufacturer. ‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.” (DX-96)</p>
<p>a second set of predetermined criteria associated with items from each of said catalogs;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K85 at p. 19):</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S85 at p. 19):</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>“If ‘second set of pre-determined criteria’ means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525 & L0127528.” (DX-141)</p>	<p>“If ‘second set of pre-determined criteria’ means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. ‘The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be.’ L0123609.” (DX-96)</p> <p>“J-CON also provided for wildcard searching: ‘When you use wild card and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices.’ L0123473.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R85 at p. 19):</p> <p>“J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).” (DX-96)</p>
<p>a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K86 at p. 19):</p> <p>“P.O. Writer accommodated catalogs of multiple vendors: ‘You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.</p> <p>The database could be searched by vendor number, indicating a portion to be searched separately: ‘Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER].’ L0126552.” (DX-117)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S86 at p. 19):</p> <p>“‘You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search.’ L0123624.</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>The purpose of InterChange was to allow selection from among competitive items from multiple sources.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S87 at p. 19):</p> <p>“J-CON had a sophisticated system for keeping track of equivalent items, dividing them into ‘Replaced Parts,’ ‘Substitute Parts,’ and ‘Can-Use Parts.’ L0123551. Furthermore, ‘Alternate Parts’ and ‘Primary and Alternate Manufacturers’ are disclosed at L0123613.” (DX-96)</p>
<p>a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol; and</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K89 at p. 20):</p> <p>“The search engine confines its search to the catalogs identified by the first set of criteria, and therefore relies on those criteria. L0127525 & L0127528.” (DX-141)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J89 at p. 20):</p> <p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).” (DX-141)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S89 at p. 20):</p> <p>“J-CON included a search program for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.” (DX-96)</p> <p>““Once you’ve entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer.” L0123623.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R89 at p. 20):</p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96)</p>
<p>a cross-reference table linking a vendor item catalog number from said vendor catalog with an item catalog number from said predetermined third party.</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K91 at p. 20):</p> <p>“This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S92 at p. 20):</p> <p>““If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don’t stock (called</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed 'determination system.' An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent." (DX-117)</p>	<p>competitive parts) to parts in lines you do stock (called InterChange parts).' L0123601. '[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references.' L013628." (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R91 at p. 20):</p> <p>"J-CON included a cross-reference module. (L0123450 & L0123601)." (DX-96)</p>
Claim Element – 172 Patent	Admitted Exhibits Relied on by Dr. Shamos for PO Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
<p>1. An electronic sourcing system comprising:</p>	<p>From Shamos Report (Ex. F) at ¶181:</p> <p>"The P.O. Writer Plus system was an electronic sourcing system that included an electronic database that retained and retrieved product information from multiple vendors, including information such as an item number, item description, inventory location, price, commodity code, unit of measure, and vendor identification. The P.O. Writer Manual, Guided Tour at 22 & 130-31." L0126552, L0126661-62 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K15 at p. 2):</p> <p>"P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.</p> <p>Locating items is disclosed at L0127525-30 (Requisitioning manual)." (DX-141)</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>"The J-CON Manual describes an electronic-sourcing system, the J-CON ("Jobber- Connection") system, that was designed for use in the operation and management of automotive parts stores (automotive parts stores were called "Jobbers" in the J-CON literature). The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the '683 Patent Reexamination at 10 & 33; Non-Final rejection in the '172 Patent Reexamination at 22)." L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S15 at p. 2):</p> <p>"J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: 'PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket.'" (DX-96)</p> <p>"Purchasing items is disclosed [sic], e.g., at L0123459 et seq. ('Start the Sale'). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information)." (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R15 at p. 2):</p> <p>"J-CON is an electronic sourcing system. (L0123423)." (DX-96)</p>
<p>a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately;</p>	<p>From Shamos Report (Ex. F) at ¶182:</p> <p>"The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .)." L0126576-77 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K17 at p. 3):</p> <p>"P.O. Writer maintained catalog data in an electronic database (electronic format): 'Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base.' L0126575." (DX-117)</p> <p>"P.O. Writer accommodated catalogs of multiple vendors: 'You can now buy</p>	<p>From Shamos Claim Chart (Ex. H) (Cell S17 at p. 3):</p> <p>"To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a 'separate portion,' this limitation is also met by J-CON and Lawson's prior art system.</p> <p>J-CON maintained a database of items. 'J-CON's Point-of-Sale/total Recall uses the latest Relational Database (RDB) technology so that even the most inexperienced counterperson can quickly and accurately enter sales and print tickets.' L0123449. Different portions of the database could be searched separately." (DX-96)</p> <p>"J-CON's database contained products of multiple vendors. L0123693" (DX-96)</p> <p>"J-CON also maintained a</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>this item from Best Buy, Bayless. or any other vendor you would like to select.’ L0126552.” (DX-117)</p> <p>“The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: ‘Since you haven’t received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER].’ L0126552.” (DX-117)</p> <p>“Catalogs were published by vendors: ‘Bayless Stationer publishes a catalogue of office supplies they sell.’ L0126575” (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell J17 at p. 3):</p> <p>“P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).” (DX-140; DX-117)</p>	<p>PartFinder database. L0123658” (DX-96)</p> <p>“J-CON further made use of a PartSource database: ‘PartSource is a licensed product from CCI that uses Relational Database (RDB) technology to give you price sheet prices and the correct selling price for parts that are not in your JIF.’ L0123472.” (DX-96)</p>
<p>means for entering product information that at least partially describes at least one desired item;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell K21 at p. 3):</p> <p>“Fields of product information are entered via a catalog screen (user interface): ‘The FILE DISPLAY screen appears. The ITEM MASTER FILE can be displayed in ITEM NUMBER sequence, DESCRIPTION sequence, or in COMMODITY CODE sequence. Move the cursor to the Item Description sort and display all items whose description begins with the letter C. as shown below.’ L0126557. The first letter of the description at least partially describes at least one desired item, as does the item number or commodity code.</p> <p>The display of information is performed by a software module that provides product information describing one of more items.” (DX-117)</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S21 at p. 3):</p> <p>“J-CON discloses a means for entering product information that at least partially describes at least one desired item. Line items (desired items) are partially described on a display screen by</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
		<p>specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.” (DX-96)</p> <p>“In PartSource, items can be partially described via wildcards: ‘With PartSource you can use wild cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters.’ L0123472.” (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R21 at p. 3):</p> <p>“J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).” (DX-96)</p>
<p>means for searching for matching items that match the entered product information in the selected portions of the database;</p>	<p>From Shamos Report (Ex. F) at ¶182:</p> <p>“The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .).” L0126576-77 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K24 at p. 4):</p> <p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525.” (DX-141)</p>	<p>From Shamos Report (Ex. F) at ¶196:</p> <p>“The J-CON system maintained a library of automotive parts catalogs from many sources in an electronic database, portions of which could be selected and searched for a desired automotive part. (The JCON Manual at Ch. 3, Sec. 2, Pages 1 & 11 & Ch. 5, Sec. 3, Page 1; Final Rejection in the ’683 Patent Reexamination at 10 & 33; Non-Final rejection in the ’172 Patent Reexamination at 22).” L123603, L0123613, L0123805 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell R23 at p. 4):</p> <p>“J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).” (DX-96)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p>From Shamos Claim Chart (Ex. H) (Cell J23 at p. 4):</p> <p>“P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).” (DX-117)</p>	
<p>means for generating an order list that includes at least one matching item selected by said means for searching;</p>	<p>From Shamos Claim Chart (Ex. H) (Cell J25 at p. 4):</p> <p>“P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).” (DX-117)</p>	<p>From Shamos Claim Chart (Ex. H) (Cell R25 at p. 4):</p> <p>“J-CON created list of parts meeting a specific criteria in which a user could select parts and quantities to purchase. (L0123603 & L0123610-11).” (DX-96)</p>
<p>means for building a requisition that uses data obtained from said database relating to selected matching items on said order list;</p>	<p>From Shamos Report (Ex. F) at ¶183:</p> <p>“After a desired item was selected from the results of a database search, the P.O. Writer Plus system was capable of transferring the relevant product information for the selected item from the database onto an electronic requisition. (The P.O. Writer Manual, Guided Tour at 47-49 & 117-47 . . .)” L0126577-79, L0126648-78 (DX-117)</p> <p>From Shamos Claim Chart (Ex. H) (Cell K29 at p. 5):</p> <p>“The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.</p> <p>A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as</p>	<p>From Shamos Report (Ex. F) at ¶197:</p> <p>“Upon selection of desired parts from database search results, the J-CON system could transfer the relevant automotive parts information for the selected parts from the database onto an electronic requisition (called a “ticket” in the J-CON literature). (The J-CON Manual at Ch. 3, Sec. 2, Pages 1, 4 & 8-9; Final Rejection in the ‘683 Patent Reexamination at 11-12 & 34; Non-Final rejection in the ‘172 Patent Reexamination at 23).” L0123603, L0123607, L0123611-12 (DX-96)</p> <p>From Shamos Claim Chart (Ex. H) (Cell S29 at p. 5):</p> <p>“The requisition module has access to data in the database: ‘PartFinder is J-CONs electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts customer wants and put them on the ticket.’ L0123601” (DX-96)</p> <p>From Shamos Claim Chart (Ex.</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	described in the citations for element 1d, above and at L0127531-36.” (DX-141)	H) (Cell R29 at p. 5): J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).” (DX-96)
means for processing said requisition to generate purchase orders for said selected matching items.	<p data-bbox="565 447 987 499">From Shamos Report (Ex. F) at ¶183:</p> <p data-bbox="565 531 987 1077">“For a selected item in the requisition, the P.O. Writer Plus system was capable of: (1) determining the availability of the item in the inventory of the customer; (2) utilizing EDI transactions or issuing RFQs to multiple vendors to ascertain, record, and retrieve the availability of the selected item from a prospective vendor; (3) determining the price of an item; (4) cross-referencing or converting data relating to the selected item to a generally equivalent item from a different source; and (5) generating multiple purchase orders from a single requisition. (The P.O. Writer Manual, Guided Tour at 49 & 149-53).” L0126680-84 (DX-117)</p> <p data-bbox="565 1108 987 1171">From Shamos Claim Chart (Ex. H) (Cell K31 at p. 5):</p> <p data-bbox="565 1203 987 1318">“The reference discloses a purchase order generation module operating on a computer system having access to the requisition.</p> <p data-bbox="565 1350 987 1507">The user causes a purchase order to be generated from a requisition at least when the user enter ‘P’ or ‘U’ as described at L0127535 to transmit the requisition to Purchasing.” (DX-141)</p> <p data-bbox="565 1539 987 1875">Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. ‘Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically.’ L0126966” (DX-133)</p>	<p data-bbox="1011 447 1391 499">From Shamos Report (Ex. F) at ¶200:</p> <p data-bbox="1011 531 1391 867">“Finally, the J-CON system could generate multiple purchase orders from a single requisition. (The J-CON Manual at Ch. 4, Sec. 3, Page 1 & Ch. 4, Sec. 4, Pages 1-7; Final Rejection in the ’683 Patent Reexamination at 12; Non-Final rejection in the ’172 Patent Reexamination at 23-24).” L0123691; L0123693-699 (DX-96)</p> <p data-bbox="1011 898 1391 961">From Shamos Claim Chart (Ex. H) (Cell S31 at p. 5):</p> <p data-bbox="1011 993 1391 1171">““You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS.’ L0123693” (DX-96)</p> <p data-bbox="1011 1203 1391 1507">“The module has access to the requisition (ticket): ‘When you compute PO for pdmai or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered.’ L0123695” (DX-96)</p> <p data-bbox="1011 1539 1391 1602">From Shamos Claim Chart (Ex. H) (Cell R31 at p. 5):</p> <p data-bbox="1011 1633 1391 1749">“J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).” (DX-96)</p>

Claim Element	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer	Admitted Exhibits Relied on by Dr. Shamos for J-CON
	<p data-bbox="565 254 964 317">From Shamos Claim Chart (Ex. H) (Cell J31 at p. 5):</p> <p data-bbox="565 344 980 464">“Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).” (DX-133)</p>	